

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOAN COMAS : CHAPTER 13
Debtor. :

LAKEVIEW LOAN SERVICING, LLC :
Movant, :
vs. :
JOAN COMAS : CASE NO. 5-17-00882
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Joan Comas, the Debtor, and files an Answer to Lakeview Loan Servicing, LLC's Motion for Relief From the Automatic Stay:

1. John and Jennifer Wilson (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor fell behind on the payments. Debtor wishes to enter into a Stipulation to cure the arrears over six (6) months.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtors respectfully request that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: April 27, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 27, 2018, he caused a true and correct copy of Debtor's Answer to Lakeview Servicing, LLC Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James C. Warmbrodt, Esq. at jwarmbrodt@kmlawgroup.com

Dated: April 27, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire